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   Maria Teresita Madrid-Hernandez
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                            UNITED STATES DISTRICT COURT
                          SOUTHERN DISTRICT OF CALIFORNIA
10
                                    (Hon. Dana M. Sabraw)
11
12
   UNITED STATES OF AMERICA,
                                                  CASE NO. 08 CR 442-DMS
13
                      Plaintiff,
                                                  JOINT MOTION FOR
14
                                                  CONTINUANCE OF
         VS.
15
                                                   ACCEPTANCE OF PLEA AND
                                                   SENTENCING HEARING
16
   MARIA TERESITA MADRID-
17
   HERNANDEZ,
                                                   Current Date: May 23, 2008
                                                   Time: 9:00 a.m.
18
                      Defendant.
19
                                                   Prop. Date: July 25, 2008
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21
         NOW COMES Defendant, Maria Teresita Madrid-Hernandez, by and through counsel,
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   Martin G. Molina, and Plaintiff, the United States of America, by and through counsel, Fred
23
   Sheppard, and herein jointly request this Court to continue the acceptance of plea and
24
   sentencing hearing currently set for May 23, 2008 at 9:00 a.m., to July 25, 2008 at 9:00 a.m.
25
   Defendant is presently in custody.
26
         Furthermore, the parties agree and stipulate that the time between May 23, 2008 and
27
   July 25, 2008 is excludable under the Speedy Trial Act.
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2 Dated: May 19, 2008

By: <u>/s/ Martin G. Molina</u>

Martin G. Molina

mmolinaesq@yahoo.com

CJA Attorney for Defendant

MARIA TERESITA MADRID-HERNANDEZ

10 Dated: May 19, 2008

By: /s/ Fred Sheppard

FRED SHEPPARD

**Assistant United States Attorney**